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ORIGINAL

# UNITED STATES DISTRICT COURT

### M.S. DISTRICT COURT REATHERN DIST, OF TH FT. WORTH DIVISION

# NORTHERN DISTRICT OF TEXAS

2015 JUN 10 PM 4: 42

FORT WORTH DIVISION

CLERK OF COURT

TAKESHA BELL

Plaintiff

CASE # 4:14-CV-388-Y

Vs

(Consolidated with 4:14-CV-430-Y)

BARRETT, DAFFIN, FRAPPIER, TURNER & ENGEL LLP, et al

Defendant

## PLAINTIFF'S MOTION FOR RECONSIDERATION OF JUDGES' ORDER TO DISMISS DEFENDANTS WELLS FARGO BANK N.A. et al

TAKESHA BELL Plaintiff herein, file this Plaintiff Motion for Reconsideration of Judges' order to Dismiss Defendants Wells Fargo Bank N.A et al, and in support of said motion would show unto this Court the following:

- 1. The request for reconsideration of dismissal of Defendants Wells Fargo Bank N.A et al is necessary for the following reasons. I am a pro se and did not have the legal staff or anyone to help me conduct research on how to locate Registered Agent for a National Association so it took Plaintiff a little longer than May 28, 2015 deadline.
- 2. Plaintiff contacted Defendants attorney on June 3, 2015 inquiring if he would accept service for his clients explaining the difficulties of finding the correct agency to send Summons and Complaint.
- 3. Things were progressing when the Court made the ruling and it is in the best interest of all parties to reverse the order and save all the time that would be required to do an amended complaint, answer from the other parties and the time for the court to consider those.
- 4. The Court can contact Hughes County Sheriff's office 3200 E Hwy 34 ste 9 Pierre SD 57501 phone number 605-773-7470 served to Registered Agent Corporation Service Company 503 S. Pierre St. Pierre SD 57501.
- 5. Summons and Complaint was served on June 9, 2015 awaiting confirmation proof of service to be mailed to Plaintiff from Hughes County.

WHEREFORE, PREMISES CONSIDERED, Plaintiff pray that the foregoing motion be granted in all respects.

Respectfully submitted,

Takesha Bell

# PLAINTIFF'S MOTION FOR RECONSIDERATION TO RE-ADD DEFENDANTS WELLS FARGO BANK N.A. et al

#### **CERTIFICATE OF CONFERENCE**

Defendant's Counsel Johnathan E. Collins on June 10, 2015 has advised the Plaintiff that Defendant does oppose the relief requested in the foregoing motion.

Takesha Bell

#### **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing Plaintiffs Motion for Reconsideration of Judges' order to Dismiss Defendants Wells Fargo Bank N.A et al has been served on Defendant counsel Johnathan E. Collins via e-mail and certified mail on this 10th day of June, 2015.

Takesha Bell